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Filing date: **01/27/2014**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91203277
Party	Defendant Palm Beach Motoring Accessories, Inc.
Correspondence Address	LEO ZUCKER LAW OFFICE OF LEO ZUCKER 2591 DUNNING DRIVE, PO BOX 1177 YORKTOWN HEIGHTS, NY 10598-8177 UNITED STATES lzpatents@gmail.com
Submission	Motion to Compel Discovery
Filer's Name	Leo Zucker
Filer's e-mail	lzpatents@gmail.com
Signature	/Leo_Zucker/
Date	01/27/2014
Attachments	Brief.pdf(35456 bytes) Declaration_LZ.pdf(37794 bytes) Exhibit_1.pdf(11789 bytes) Exhibit_2.pdf(12294 bytes) Exhibit_3.pdf(15720 bytes) Exhibit_4.pdf(74929 bytes) Exhibit_5.pdf(40035 bytes) Exhibit_6.pdf(36617 bytes)

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Before the Trademark Trial and Appeal Board

3D International, LLC,)
a California Limited Liability Company,)
)
Opposer,)
)
v.)
)
Palm Beach Motoring Accessories, Inc.,)
a Florida Corporation,)
)
Applicant.)

Opposition Nos. **91203277 (parent)**
91203279

Application No. 85-261,047
Mark: AUTOPIA FORUM, in Class 38

Application No. 85-312,684
Mark: AUTOPIAFORUMS, in Class 38

**BRIEF IN SUPPORT OF APPLICANT'S MOTION TO COMPEL DISCOVERY
AND TO RESET TRIAL SCHEDULE**

TO: Trademark Trial & Appeal Board
Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

Thomas W. Cook, Esq.,
Thomas Cook Intellectual Properties
3030 Bridgeway, Suite 425
Sausalito, CA 94965

Law Office of Leo Zucker
Attorney for Applicant
P.O. Box 1177
Yorktown Heights, NY 10598

Telephone: (914) 302-2460

January 27, 2014

Applicant Palm Beach Motoring Accessories, Inc. (PBMA) respectfully moves under 37 C.F.R. § 1.120(e) for an Order compelling Opposer 3D International, LLC (3D), to provide adequate responses to PBMA's First Set of Interrogatories Nos. 5, 6, 7, and 14, and to PBMA's First Set of Requests for Production of Documents Nos. 1-5, both of which were served on 3D on December 10, 2013. The motion is supported by an accompanying Declaration of Leo Zucker including Exhibits 1-6.

FACTUAL BACKGROUND

As stated in the accompanying Declaration, PBMA served all of the discovery requests at issue on 3D by U.S. mail, on December 10, 2013. The 30-day term for 3D to respond therefore expired January 14, 2014. 3D did not request an extension, and, on January 13, 2014, the undersigned inquired about the status of 3D's responses via e-mail to 3D's attorney. On January 16, 3D's attorney replied that the responses were served by post on the same day. The undersigned followed up again on January 22, informing 3D's attorney that the responses had not been received, and that PBMA would move to compel the responses without objections if not received by January 24. 3D's responses were finally received in the U.S. mail by the undersigned on January 23, 2014. Both sets of responses include objections as shown in Exhibit 4 (pages 1-2), and Exhibit 5 (both pages).

PBMA's document requests 1-5 are reproduced in Exhibit 4, with 3D's response following each request. In addition to its written responses, 3D produced a loose stack of over 200 unbound and unindexed pages consecutively numbered at the bottom from 3D-0001 to 3D-0222. As shown in Exhibit 4, each of 3D's responses refers collectively to the produced "documents numbered 3D-0001 through 3D-0220 [*sic*]." Further, a number of pages randomly sampled from the stack apparently are not responsive to any of the document requests.

PBMA's interrogatories 5, 6, 7, and 14 are reproduced in Exhibit 6, each followed by 3D's response. Like 3D's responses to PBMA's document requests, each response refers to the produced loose 200+ page stack collectively as containing an answer to the propounded interrogatory. Moreover, a number of pages randomly sampled from the stack also do not appear to be responsive to any of the interrogatories at issue.

ARGUMENT

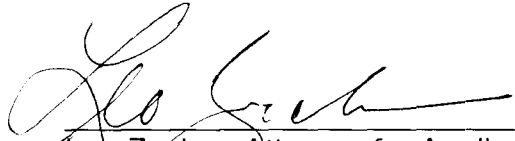
Rule 34(b)(2)(E)(i), Fed. R. Civ. P., states that a "party must produce documents as they are kept in the usual course of business or must organize and label them to correspond to the categories in the request; . . ." Further, citing *No Fear Inc. v. Rule*, 54 USPQ2d 1551, 1556 (TTAB 2000), the TBMP states in note 5 of § 406.04(c)

that a party “may not simply dump large quantities of documents containing responsive as well as unresponsive documents.”

Without the aid of a document index or other means for categorizing the pages of the stack produced by 3D so as to correspond with each of PBMA's discovery requests, PBMA would bear an unreasonable burden by having to take time only to “guess” which ones of the 200+ pages in the stack are responsive to each document request and/or interrogatory at issue. PBMA therefore submits that 3D is obliged to identify which pages, if any, of the large stack it produced relate to each of PBMA's document requests and interrogatories, whether by way of an index or other appropriate means. PBMA should not be made to sift through the stack in search of each document it requested, or an answer to an interrogatory. A proper response is required from 3D for each request. See Fed. R. Civ. P. 34(b)(2)(B), and *Mulero-Abreu v. Puerto Rico Police Dept.*, 675 F.3d 88, 93 (1st Cir. 2012).

Moreover, in view of the period during which these proceedings will be suspended pending a decision on the present motion, PBMA respectfully requests that the trial schedule including the close of discovery be reset accordingly.

Respectfully submitted,



Leo Zucker, Attorney for Applicant
Palm Beach Motoring Accessories, Inc.

CERTIFICATE OF SERVICE

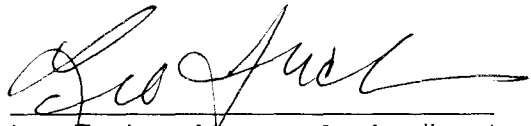
I hereby certify that the within Brief in Support of Applicant's Motion to Compel Discovery And to Reset Trial Schedule, and the accompanying Declaration of Leo Zucker with Exhibits, were served upon Opposer 3D International, LLC, by depositing same with the U.S. Postal Service as first class mail in a sealed envelope, postage prepaid and addressed to:

Thomas W. Cook, Esq.,
Thomas Cook Intellectual Properties
3030 Bridgeway, Suite 425
Sausalito, CA 94965

and by e-mail addressed to:

tom@thomascooklaw.com,

on January 27, 2014.



Leo Zucker, Attorney for Applicant
Palm Beach Motoring Accessories, Inc.

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
Before the Trademark Trial and Appeal Board

3D International, LLC,)	
a California Limited Liability Company,)	
)	Opposition Nos. 91203277 (parent)
Opposer,)	91203279
)	
v.)	Application No. 85-261,047
)	Mark: AUTOPIA FORUM, in Class 38
Palm Beach Motoring Accessories, Inc.,)	
a Florida Corporation,)	Application No. 85-312,684
)	Mark: AUTOPIAFORUMS, in Class 38
Applicant.)	

**DECLARATION OF LEO ZUCKER IN SUPPORT OF APPLICANT'S MOTION TO
COMPEL DISCOVERY AND TO RESET TRIAL SCHEDULE**

TO: Trademark Trial & Appeal Board
Commissioner for Trademarks
P.O. Box 1451
Alexandria, VA 22313-1451

Thomas W. Cook, Esq.,
Thomas Cook Intellectual Properties
3030 Bridgeway, Suite 425
Sausalito, CA 94965

Law Office of Leo Zucker
Attorney for Applicant
P.O. Box 1177
Yorktown Heights, NY 10598

Telephone: (914) 302-2460

January 27, 2014

LEO ZUCKER, hereby deposes and states:

1. I am over 18 years of age, and I have personal knowledge of all matters set forth below.

2. I am an attorney at law, admitted to practice in the Courts of the State of New York and before the United States Patent and Trademark Office (Registration No. 27,608). I represent applicant Palm Beach Motoring Accessories, Inc. (PBMA) in the present opposition proceedings.

4. On December 10, 2013, PBMA served Applicant's First Set of Interrogatories (numbered 1-20) on opposer (3D) by first class U.S. mail, and addressed to 3D's attorney of record. 3D's responses to PBMA's interrogatories were therefore due to be served by January 14, 2014, in the absence of any stipulated or ordered extensions.

5. Also on December 10, 2013, PBMA served Applicant's First Set of Requests for Production of Documents and Things (numbered 1-5) on 3D by first class U.S. mail, and addressed to 3D's attorney. Thus, 3D's responses to PBMA's document requests were also due to be served by January 14, 2014, in the absence of any stipulated or ordered extensions.

6. Having received no request from 3D for an extension of time to respond to PBMA's interrogatories and document requests, I sent an e-mail to 3D's attorney on January 13, 2014, asking him to advise me on the status of 3D's responses. See Exhibit 1 attached hereto.

7. On January 16, 2014, I received an e-mail from 3D's attorney stating that the responses were served by post that day. See Exhibit 2.

8. Not having received the responses alleged by 3D to have been served by post on January 16, I advised 3D's attorney by e-mail on January 22, 2014, that because there was no agreement or order extending 3D's time to respond, (i) the alleged service date of January 16 was late, and (ii) PBMA would move to compel responses without objections if the responses were not received by January 24. See Exhibit 3.

9. I received 3D's responses to PBMA's interrogatories and document requests by U.S. mail on January 23, 2014. I believe certain of the responses are deficient as explained below and by way of the referenced exhibits.

3D's Responses to PBMA's Document Requests

10. Attached as Exhibit 4 are 3D's written responses¹ to each of PBMA's numbered document requests. Each response is preceded by the corresponding request.

11. Included with 3D's written responses was an unindexed and ungrouped stack of over 200 separate pages numbered consecutively at the bottom of each page beginning with "3D-0001" and ending with "3D-0222".

12. As seen at pages 2-3 of Exhibit 4, each of 3D's responses to PBMA's five document requests ends with "Opposer produces herewith documents numbered 3D-0001 through 3D-0220 [*sic*]."

13. A number of the 200+ documents selected randomly from the stack do *not* appear to be responsive to any of PBMA's five document requests.

14. I believe that 3D, rather than PBMA, should incur the cost for the time required to identify which, if any, of the 200+ separate pages produced by 3D pertain to

¹ The responses are mistitled as "Applicant's Response to Opposer's Request for Production of Documents and Things, Set One."

each of PBMA's document requests by providing a document index or other appropriate means.

15. At pages 1-2 of Exhibit 4, 3D states certain "General Objections" to PBMA's document requests, and incorporates general objections that are set out by 3D at pages 1-2 of its response to PBMA's interrogatories. The latter pages are attached hereto as Exhibit 5. In view of the untimely service of 3D's responses to PBMA's interrogatories and document requests, I respectfully request that all of the objections stated in the responses be deemed as having been waived.

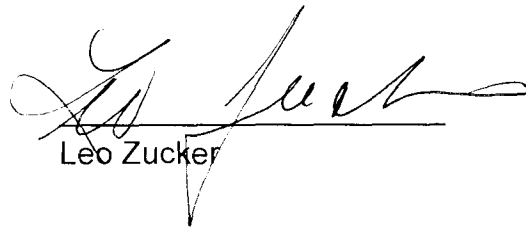
3D's Responses to PBMA's Interrogatories 5, 6, 7, and 14

16. Attached as Exhibit 6 are PBMA's Interrogatories 5, 6, 7, and 14, each followed by 3D's response. Each response refers collectively to the 200+ pages produced by 3D as containing an answer to the propounded interrogatory.

17. Without the aid of a citation to a specific page or set of pages in each of 3D's responses, an unreasonable burden would be placed on PBMA to take the time required only to "guess" which ones among the 200+ pages produced by 3D contain an answer to each of Interrogatories 5, 6, 7, and 14.

18. I believe 3D, rather than PBMA, should bear the cost for the time required to identify which, if any, of the produced 200+ pages contain an answer to each of Interrogatories 5, 6, 7, and 14, by providing specific page citations or other appropriate means in 3D's responses to each interrogatory.

19. I further declare that all statements made of my own knowledge are true, and all statements made on information and belief are believed to be true, and that I have been warned that willful false statements and the like are punishable by fine or imprisonment, or both, under 18 U.S.C. 1001, and that such willful false statements and the like may jeopardize the validity of the opposed applications or documents or any registrations resulting therefrom.



Leo Zucker

Date: January 27, 2014

Leo Zucker

From: Leo Zucker [lzpatents@gmail.com]
Sent: Monday, January 13, 2014 5:23 PM
To: 'tom@thomascooklaw.com'
Subject: 3D v. PBMA "Autopia" oppositions - PBMA's First Set of Discovery Requests
Importance: High

Thomas,

I believe 3D's responses to PBMA's First Set of Discovery Requests are due tomorrow 1/14/2014. Please advise.

Thanks,
Leo

Law Office of Leo Zucker
Patent & Trademark Law
PO Box 1177
Yorktown Heights, NY 10598

Tel (914) 302-2460
Fax (914) 302-2459

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EXHIBIT 1

Leo Zucker

From: Thomas Cook [tom@thomascooklaw.com]
Sent: Thursday, January 16, 2014 4:47 PM
To: Leo Zucker
Subject: Re: 3D v. PBMA "Autopia" oppositions - PBMA's First Set of Discovery Requests

Leo:

Served by post today.

Thomas.

-
--

Thomas Cook Intellectual Property Attorneys P.O. Box 1989, 3030 Bridgeway, Suite 425-430 Sausalito, California 94965-1989
Telephone: 415-339-8550

On 1/13/2014 2:22 PM, Leo Zucker wrote:

> Thomas,
>
> I believe 3D's responses to PBMA's First Set of Discovery Requests are
> due tomorrow 1/14/2014. Please advise.
>
> Thanks,
> Leo
>
> Law Office of Leo Zucker
> Patent & Trademark Law
> PO Box 1177
> Yorktown Heights, NY 10598
>
> Tel (914) 302-2460
> Fax (914) 302-2459
>
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> If you are not an intended recipient, kindly notify the sender by
> reply e-mail, and destroy this communication and any copies thereof in
> your possession.
>

EXHIBIT 2

Leo Zucker

From: Leo Zucker [lzpatents@gmail.com]
Sent: Wednesday, January 22, 2014 10:26 PM
To: 'tom@thomascooklaw.com'
Subject: 3D v. PBMA "Autopia" oppositions - PBMA's First Set of Discovery Requests

Thomas,

Per your e-mail below, you indicated 3D's responses to PBMA's discovery requests were served by US mail on Jan 16. Since we had no agreement or order extending 3D's time to respond, the service date would be two days late and any objections to the discovery requests would have been waived.

We have not yet received 3D's responses by US mail, and discovery was last reset by the TTAB to close on Jan 26. Therefore, please note that if full responses are not received by this Friday Jan 24, PBMA will have no choice but to file a motion to compel the responses without objections, and to impose such sanctions as the TTAB deems proper under the circumstances.

Leo

Law Office of Leo Zucker
Patent & Trademark Law
PO Box 1177
Yorktown Heights, NY 10598

Tel (914) 302-2460
Fax (914) 302-2459

This e-mail and any attached files or items are proprietary and subject to attorney-client or work product privileges. The use or disclosure of this communication by anyone other than a designated addressee is unauthorized. If you are not an intended recipient, kindly notify the sender by reply e-mail, and destroy this communication and any copies thereof in your possession.

-----Original Message-----

From: Thomas Cook [mailto:tom@thomascooklaw.com]
Sent: Thursday, January 16, 2014 4:47 PM
To: Leo Zucker
Subject: Re: 3D v. PBMA "Autopia" oppositions - PBMA's First Set of Discovery Requests

Leo:

Served by post today.

Thomas.

-
--

Thomas Cook Intellectual Property Attorneys P.O. Box 1989, 3030 Bridgeway, Suite 425-430 Sausalito, California 94965-1989
Telephone: 415-339-8550

EXHIBIT 3

1 direct knowledge of Applicant, and Opposer cannot determine, except by Applicant's own
2 statements, whether Applicant is associated with any of the services Applicant identifies, or any
3 particular source for such services. Accordingly, Opposer objects to all questions which call for
4 information about Applicant, its goods or services, its marketing, and all other aspects of
5 Applicant's business. Further, Opposer is without knowledge or information sufficient to form a
6 belief as to the truth of the statements set forth in these Requests if such statements call for
7 documents related to Applicant, its business, and its marks. Opposer therefor cannot produce any
8 document concerning Applicant and Opposer will, under such circumstances, state that it has no
9 documents responsive to such requests.

10
11 **APPLICANT'S RESPONSE TO REQUEST**
12 **FOR PRODUCTION OF DOCUMENTS AND THINGS**
13

14 REQUEST FOR PRODUCTION NO.1.

15 1. All documents identified in response to Applicant's Interrogatories 2, 3, 5, 6, 7, 10, 13,
16 and 14, served concurrently herewith.

17 RESPONSE TO REQUEST FOR PRODUCTION NO.1.

18 Except for those documents which Opposer produces or will produce in response to any
19 other request of Applicant as set forth herein, Opposer produces herewith documents numbered
20 3D-0001 through 3D-0220.

21 REQUEST FOR PRODUCTION NO. 2.

22 2. All documents 3D will use as evidence that the web site at www.autopia.org used
23 AUTOPIA as a trademark prior to March 8, 2011.

24 RESPONSE TO REQUEST FOR PRODUCTION NO. 2.

25 Except for those documents which Opposer produces or will produce in response to any
26 other request of Applicant as set forth herein, Opposer produces herewith documents numbered
27 3D-0001 through 3D-0220.

28 ///

EXHIBIT 4 2/4

1 REQUEST FOR PRODUCTION NO. 3.

2 3. All documents 3D will use as evidence that the web site at www.autopia.org used
3 AUTOPIA as a trademark prior to May 4, 2011.

4 RESPONSE TO REQUEST FOR PRODUCTION NO.3.

5 Except for those documents which Opposer produces or will produce in response to any
6 other request of Applicant as set forth herein, Opposer produces herewith documents numbered
7 3D-0001 through 3D-0220.

8 REQUEST FOR PRODUCTION NO. 4.

9 4. All documents 3D will use as evidence that the web site at www.autopia.org used
10 AUTOPIA FORUMS as a trademark prior to March 8, 2011.

11 RESPONSE TO REQUEST FOR PRODUCTION NO. 4.

12 Except for those documents which Opposer produces or will produce in response to any
13 other request of Applicant as set forth herein, Opposer produces herewith documents numbered
14 3D-0001 through 3D-0220.

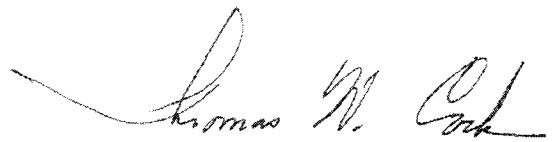
15 REQUEST FOR PRODUCTION NO. 5.

16 5. All documents 3D will use as evidence that the web site at www.autopia.org used
17 AUTOPIA FORUMS as a trademark prior to May 4, 2011.

18 RESPONSE TO REQUEST FOR PRODUCTION NO. 5

19 Except for those documents which Opposer produces or will produce in response to any
20 other request of Applicant as set forth herein, Opposer produces herewith documents numbered
21 3D-0001 through 3D-0220.

22
23
24 Date: January 13, 2014



Thomas W. Cook, Reg. No. 38,849
Attorney for Applicant
3030 Bridgeway, Suite 425-430
Sausalito, California 94965
Telephone: 415-339-8550

EXHIBIT 4 3/4

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I am over the age of 18 years, and am not a party to the within cause. I am employed in Sausalito, California.

On the date first written below, I served a true copy of the attached document entitled:

by placing it in a sealed envelope and depositing it in the United States mail, first class postage fully prepaid, addressed to the following:

I declare under penalty of perjury that the foregoing is true and correct. Executed at
Sausalito, California.


Thomas Cook

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4 || Mark: AUTOPIA FORUM; AUTOPIAFORUMS

7 || Opposer,

9 | Palm Beach Motoring Accessories, Inc.,
| a Florida Corporation,

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15	Propounding Party:	Applicant, Palm Beach Motoring Accessories, Inc.
16	Responding Party:	Opposer, 3D International, LLC.
	Set Number:	One

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Opposer hereby generally objects to the Interrogatories, to the extent the interrogatories contained therein are overbroad, indefinite, vague, ambiguous, and unduly burdensome, and to the extent they seek information not likely to lead to the discovery of information relevant to this proceeding, or insofar as it purports to impose obligations that exceed those required under Rules 26 and 33, FRCP. Opposer further objects to the Interrogatories on the basis of attorney-client privilege where any Interrogatory could be construed to require the disclosure of communications

EXHIBIT 5 1/2

1 between Opposer and its counsel, or the disclosure of attorney work product privileged matter.
2 Opposer further objects to any interrogatory which calls for information or documents or
3 admissions which are known only by, or best by, Opposer, or which are in Opposer's possession
4 only or primarily in Opposer's possession.

5 Opposer responds to the Interrogatories solely on behalf of itself, and does not respond
6 for or bind any other company, person, or party. In submitting these responses, Opposer does not
7 waive any rights or objections which may otherwise be available, nor concede to relevance,
8 competence, materiality, lack of privilege, or admissibility in evidence of such responses. All
9 responses are provided herein, and are submitted as presently advised, and without prejudice to
10 Opposer's right to modify, amend, revise, correct, supplement, add to, or clarify such responses,
11 and Opposer reserves the right to produce subsequently discovered evidence and to introduce
12 such evidence at trial.

13 For purposes of these responses, Opposer assumes Applicant has correctly identified
14 itself, and that Applicant sells the goods or services set forth in Applicant's Answer. However,
15 Opposer has no direct knowledge of Applicant, and Opposer cannot determine, except by
16 Applicant's own statements, whether Applicant is associated with any particular source for the
17 goods Applicant identifies. Accordingly, Opposer objects to all questions which call for
18 information about Applicant, its' goods or services, its' marketing, and all other aspects of
19 Applicant's business.

20 21 **RESPONSES TO INTERROGATORIES**

22 23 INTERROGATORY NO. 1.

24 1. With respect to paragraph 2 of opposer's First Amended Notices of Opposition, did the
25 3D Agreement expressly convey any trademark rights to AUTOPIA or to AUTOPIA FORUMS,
26 along with the good will symbolized by the respective mark?

27 RESPONSE TO INTERROGATORY NO. 1.

28 No.

EXHIBIT 5 2/2

24 INTERROGATORY NO. 5.

25 5. With respect to paragraph 4 of opposer's First Amended Notices of Opposition, 2009,
26 identify all documents in support of the allegation that both AUTOPIA and AUTOPIA FORUMS
27 have been in valid and continuous use as opposer's marks since the date of first use, to the
28 present date.

1 RESPONSE TO INTERROGATORY NO. 5.

2 Opposer has served its **APPLICANT'S RESPONSE TO OPPOSER'S REQUEST**
3 **FOR PRODUCTION OF DOCUMENTS AND THINGS, SET ONE** concurrently herewith,
4 and identifies the documents which accompany that response support of the allegation that both
5 AUTOPIA and AUTOPIA FORUMS have been in valid and continuous use as opposer's marks
6 since the date of first use, to the present date.

7 INTERROGATORY NO. 6.

8 6. With respect to paragraph 4 of opposer's First Amended Notices of Opposition, identify
9 all documents in support of the allegation that opposer has created a public awareness of each of
10 opposer's marks as trademarks identifying opposer as the source of opposer's services.

11 RESPONSE TO INTERROGATORY NO. 6.

12 Opposer has served its **APPLICANT'S RESPONSE TO OPPOSER'S REQUEST**
13 **FOR PRODUCTION OF DOCUMENTS AND THINGS, SET ONE** concurrently herewith,
14 and identifies the documents which accompany that response in support of the allegation that
15 both AUTOPIA have been in valid and continuous use as opposer's marks since the date of first

EXHIBIT 6 1/2

16 use, to the present date.

17 INTERROGATORY NO. 7.

18 7. Describe each instance or event of actual confusion known to opposer that arose from the
19 contemporaneous use of opposer's marks and applicant's marks, including a description of the
20 event, all persons having knowledge of the event, a description of any remedial action taken by
21 opposer, and identify all documents concerning the event.

22 RESPONSE TO INTERROGATORY NO. 7.

23 See documents produced with APPLICANT'S RESPONSE TO OPPOSER'S REQUEST
24 FOR PRODUCTION OF DOCUMENTS AND THINGS, SET ONE, served herewith,
25 particularly numbered pages 129 and 161 & 162 (where PBMA announces its change of name on
26 its website, and one "Charlie Hahn" says that it can be confusing).

14 INTERROGATORY NO. 14.

15 14. Identify all documents 3D will use as evidence that the web site at www.autopia.org
16 displayed the mark AUTOPIA on June 1, 2009, and that the web site displayed the mark
17 AUTOPIA continuously since June 1, 2009, to the present date.

18 RESPONSE TO INTERROGATORY NO. 14.

19 Opposer has served its APPLICANT'S RESPONSE TO OPPOSER'S REQUEST FOR
20 PRODUCTION OF DOCUMENTS AND THINGS, SET ONE concurrently herewith, and
21 identifies the documents which accompany that response support of the allegation that both
22 AUTOPIA and AUTOPIA FORUMS have been in valid and continuous use as opposer's marks
23 since the date of first use, to the present date. Opposer reserved the right to supplement this
24 response with further documents from its web site, the Internet Archive, and other sources.